REMARKS

Applicants respectfully present Claims 1-29 for examination in the RCE filed herewith. Claims 1, 12 and 25 have been amended herein to more clearly define the scope of the presently claimed invention. Applicants respectfully request reconsideration of pending Claims 1-29 and submit that the claims and remarks presented herein overcome the Examiner's rejections in the Final Office Action dated July 11, 2005 in the parent application.

35 U.S.C. § 102

Claims 1-6, 8-10, 12, 14, 20-23, 25-27 stand rejected under 35 U.S.C. § 102 as anticipated by Lee, et al., U.S. Patent No. 6,463,175 (hereafter "Lee"). The Examiner submits that Lee teaches all the elements of independent Claims 1, 5, 12, 21 and 25. Applicants respectfully traverse the rejection.

The invention, as claimed in independent Claims 1, 5, 12, 21 and 25 is directed to a system, apparatus, method and article for feature based image correction. More specifically the elements of these independent claims include at least the features of a system, apparatus, method and/or article for automatically detecting a feature in an image based on a correction specification, generating a feature description for the feature, and correcting the feature based on the feature description and correction specification.

Lee, on the other than, describes a structure-guided image processing and image feature enhancement system (Lee, Abstract). The Examiner suggests that various portions of Lee disclose the elements of independent Claims 1, 5, 12, 21 and 25. Specifically, the Examiner states that Lee discloses an automatic feature-based correction mechanism that "automatically detects a predetermined feature from the input image (Col. 5, lines 16-19) and corrects the detected feature according to a correction specification (Col. 5, lines 22-40). The Examiner concedes that Lee fails to explicitly cite a "correction specification" but suggests that since Lee discloses that the feature correction is based on the feature type (Col. 10, lines 17-28), this qualifies as correcting the feature. Applicants strongly disagree.

In rejecting Applicants previously presented arguments, the Examiner essentially states that the "structure-guided image feature enhancement process" of Lee is disclosed in Col. 10 of Lee and that this section essentially discloses a "correction specification." The Examiner further

submits that the "structuring element" described in this section of Lee qualifies as a correction-configuration parameter. Lee, Col. 10, lines 17-28 reads as follows:

> "Those skilled in the art should recognize that the structure-guided feature enhancement process could start with grayscale opening followed by grayscale closing or start with grayscale closing followed by opening. Opening first will enhance dark features and closing first will enhance bright features. Each opening and closing iteration could use the same size structuring element for detailed feature refinement or could use an increased size structuring element for more aggressive feature refinement. Elongated structuring elements of orthogonal directions could be alternatively or sequentially applied in the enhancement processing sequence for multiple direction feature enhancement."

Applicants respectfully disagree with the Examiner's characterization of Lee. Nothing in the sections highlighted by the Examiner describe i) detecting features automatically based on a correction specification and generating a feature description for the detected features AND ii) correcting features automatically based on the feature description and correction specification. Once again, Applicants freely admit that manual selection of various portions of an image for image correction is known in the art (see Specification, Background, p. 2, lines 7-9). There is, however, no means by which features may be *automatically detected* from an image *based on a correction specification*. As previously submitted to the Examiner, the sections of Lee highlighted by the Examiner in Col. 5 merely describe generally how the system in Lee extracts a feature from an image. There is no suggestion that this process is *automated* based on a correction specification. Furthermore, the Examiner makes no showing of how Lee discloses the remaining elements of the claims, namely "generating a feature description for the detected feature" and correcting the input image based on the feature description *and* the correction specification.

In summary, the "structure guided feature enhancement process" in Lee, as highlighted by the Examiner, has no bearing on the currently claimed invention. Lee does not show a process that i) automatically detects features based on a correction specification ii) generates a feature description for the detected feature AND iii) corrects the input image based on the feature description and correction specification. Applicants therefore respectfully submit that Lee does not disclose all elements of independent Claims 1, 5, 12, 21 and 25 and therefore does not anticipate these claims. Similarly, since all claims dependant on Claims 1, 5, 12, 21 and 25 also incorporate these elements not taught by Lee, Applicants submit that Lee also does not anticipate

dependant Claims 2-4, 6, 8-10, 14, 20, 22, 23 and 25-27. Applicants therefore respectfully request the Examiner to withdraw the 35 U.S.C. § 102 rejections to pending Claims 1-6, 8-10, 12, 14, 20-23, 25-27.

35 U.S.C. §103

Claims 7, 11 and 24 stand rejected under 35 U.S.C. §103 as being unpatentable over the combination of Lee in view of U.S. Patent No. 6,026,181 ("Murakami"). Claims 15-17 and 28-29 stand rejected under 35 U.S.C. §103 as being unpatentable over the combination of Lee in view of U.S. Patent No. 6,292,575 ("Bortolussi"). Claim 18 stands rejected under 35 U.S.C. §103 as being unpatentable over the combination of Lee and Bortolussi in further view of Murakami. And finally, Claim 19 stands rejected under 35 U.S.C. §103 as being unpatentable over the combination of Lee and Bortolussi in further view of U.S. Patent No. 6,463,432 ("Murakawa"). Applicants respectfully traverse the Examiner's rejection to the remaining claims. Applicants respectfully traverse the rejections.

Applicants respectfully point out that all of these rejections are based on Lee in combination with other references. Since Claims 7, 11, 15-17, 19 and 28-29 are dependant on independent Claims 1, 5, 12, 21 and 25, the Examiner is apparently relying on Lee to teach all elements of independent claims 1, 5, 12, 21 and 25 and suggesting that the combination of Lee with the various other references renders the dependant claims unpatentable. Applicants respectfully submit that as described above, Lee does not teach all elements of the independent claims. Thus, without addressing the propriety of combining the cited references with Lee, Applicants submit that the combination of any of these other references (Murakami, Bortolussi and/or Murakawa) with Lee also does not teach all elements of the independent claims. Since the dependant claims incorporate all elements of the independent claims, these references, alone or in combination, cannot render any of the claims unpatentable. Applicants therefore submit that Claims 7, 11, 15-17, 19 and 28-29 are patentable over Lee, Murakami, Bortolussi and/or Murakawa, alone or in combination, and respectfully request the Examiner to withdraw the 35 U.S.C. §103 rejection to these pending claims.

CONCLUSION

Based on the foregoing, Applicants respectfully submit that the applicable objections and rejections have been overcome and that pending Claims 1-29 are in condition for allowance. Applicants therefore respectfully request an early issuance of a Notice of Allowance in this case. If the Examiner has any questions, the Examiner is invited to contact the undersigned at (714) 669-1261.

If there are any additional charges, please charge Deposit Account No. 50-0221.

Respectfully submitted,

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